

**From:** [Nancy Fitz](#)  
**To:** [Joanne Durand](#)  
**Subject:** Standard zip ties as tamper evident devices  
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Joanne,

Here is our Q&A about using standard zip ties as tamper-evident devices, which I promised to send when we talked last week -

**Question:** Can a standard clear zip tie be used as a tamper-evident device on a container opening?

**Answer:** Section 165.3 of the regulations defines tamper-evident device as "a device which can be visually inspected to determine if a container has been opened." The goal of the requirement for tamper-evident devices and one-way valves on container openings is "to give refillers reasonable indication about whether substances other than the pesticide product for which the containers are labeled may have been introduced into the containers." (59 FR 6732, February 11, 2011) Ultimately, it is the responsibility of the refiller and the registrant of the pesticide being repackaged into a refillable container to ensure that the composition of the pesticide meets the composition as identified on the pesticide's confidential statement of formula. While a standard clear zip tie may meet the definition of tamper-evident device in §165.3, pesticides sold or distributed in containers that bear tamper-evident devices that do not appear secure and are easily "fakeable" may be subject to heightened enforcement scrutiny to ensure the integrity of the pesticide in the container.

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